

EXHIBIT 111

From: Greg Beam
To: George Chapman
Sent: 9/27/2012 10:01:00 PM
Subject: RE: CII utilization review

If you want you can reach me on my personal cell at 678-520-1123, I will be leaving the office shortly to get some things for tomorrow...

GB

From: George Chapman
Sent: Thursday, September 27, 2012 4:07 PM
To: Greg Beam
Subject: RE: CII utilization review

Will call in just a minute

George L. Chapman, RPh, CHC
Senior Director, Corporate Compliance
Health and Wellness Practice Compliance
Office: 479-277-8223 Fax: 479-273-8675
George.Chapman@wal-mart.com

Walmart Compliance
The Right Way - Every Day!
702 SW 8th Street
Bentonville, AR 72716-0230
Save Money, Live Better.

From: Greg Beam
Sent: Thursday, September 27, 2012 3:59 PM
To: George Chapman
Subject: RE: CII utilization review

George, could you give me a quick call when you have a sec... just one question please.. Thanks

Greg

From: George Chapman
Sent: Thursday, September 27, 2012 9:12 AM
To: Greg Beam; Susanne Hiland; Brandon Worth; Tim Harris
Subject: CII utilization review



This is a follow up to a conversation Greg and I had this morning around Asset Protections role in CII utilization reviews. We rolled out the communication with the webinar back in July around all the actions that would be taking place. To my knowledge none of these action items should have been changed and I will be reporting to the Compliance oversight committee Friday of our progress.

The plan was as follows:

1. any orders for oxycodone 30mg would have a threshold set for 20 bottles each week
2. That warehouse would supply to AP, compliance and operations each day a report that highlighted any DC orders cut for oxycodone 30mg orders and also supply a list of any stores that ordered more than 20 bottles of ANY CII

item.

3. Asset protection was to do a purchase and dispense analysis on any stores that ordered more than 20 bottles of ANY CII item. After determining that no active investigation was open or that a full AP investigation needed to occur, then AP would communicate to the Market director that a CII utilization needed to occur. The market directors were to receive a detailed action plan from asset protection which includes the CII Utilization web form. Asset protection is to use this feedback to determine if there are action items of concern for operations and/or compliance. If this is not being done as communicated, I will need to report to the committee on Friday.
4. Logistics has the responsibility to review the controlled substance exception report and responses to the CII utilization form for any order issues or anomalies.

By not following the plan set forth, Operations, Asset protection and logistics are accepting risk. If the plan needs to be changed, then the appropriate business owners need to get together and make those decisions.

Please let me know how I can assist.

George L. Chapman, RPh, CHC
Senior Director, Corporate Compliance
Health and Wellness Practice Compliance
Office: 479-277-8223 Fax: 479-273-8675
George.Chapman@wal-mart.com

Walmart * Compliance
The Right Way - Every Day!
702 SW 8th Street
Bentonville, AR 72716-0230

Save Money, Live Better.